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April 3, 2014

Ms. Rajinder Sahota
Chief
Climate Change Program Evaluation Branch
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Subject: Comments Supporting ARB Mine Methane Capture Protocol.

Holy Cross Energy supports the proposed California Air Resources Board (ARB) compliance offset protocol for mine methane capture (MMC) projects. This will be the first protocol written entirely by ARB through the public protocol development process. Offset credits represent a crucial cost containment mechanism to help the California cap-and-trade program achieve GHG emission reductions in an economically efficient manner.

Experts are now reporting that Methane is a greenhouse gas with a Global Warming Potential twenty five times that of Carbon Dioxide. Methane also is an energy source that if used conserves energy from other sources and reduces greenhouse gas emissions. The World Bank estimates that 7,500,000,000 Metric Tons of CO₂ equivalent per year of methane is emitted annually around the world. That methane if used for electricity generation for example could produce 250,000,000 Megawatt hours per year. There is currently no incentive to avoid methane emissions and rules to reduce emissions are likely to take years and never be as effective as an economic incentive. We have no verifiable estimate of methane emissions over all from active or abandoned mines as the cost of performing detailed surveys is prohibitive. This protocol will encourage the generation of new and accurate data of methane emissions from mines. This could encourage more research and measurement of methane emissions from all sources.

Holy Cross Energy encourages the Board to approve the Mine Methane Capture protocol.

Sincerely,
HOLY CROSS ENERGY

A handwritten signature in black ink, appearing to read "Delvan D. Worley".

Delvan D. Worley
Chief Executive Officer